

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case Number: 00-6309-CR-Seitz/Garber

UNITED STATES OF AMERICA

Plaintiff,

v.

DAVID BELL,

Defendant.

**MOTION TO ADOPT DEFENDANT MAMONE'S  
MOTION FOR EXTENSION OF TIME TO FILE PRE-TRIAL MOTIONS**

NOW COMES the Defendant, DAVID BELL, by and through his undersigned attorney, and respectfully files this Motion to Adopt Co-Defendant John Mamone's Motion for Extension of Time to File Pre-Trial Motions and in support of the motion states the following:

1. The pre-trial motions on this case are due to be filed on or before September 14, 2001.
2. On August 21, 2001, David Bell, was arrested on an Order granting Government's Motion to Revoke Bond.
3. His bond hearing was scheduled to be held on August 24, 2001, but was rescheduled for Thursday August 27, 2001, to allow counsel time to review five hundred (500) pages of wiretap intercepts and to further prepare for set hearing.
4. On August 27, 2001, Magistrate Turnoff, the Duty Magistrate, ruled that the bond Revocation hearing must be heard by the Magistrate who issued the original bond.
5. On August 31, 2001, a hearing was held on the Defendant's bond and Judge Seltzer ruled that the Defendant shall remain in custody.

NON-COMPLIANCE OF S.D. FL. L.R. 51.02

JEFFREY M. HARRIS, P.A.

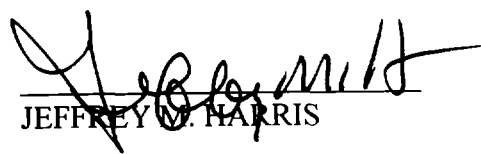
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6. Counsel was in Court on this matter on August 21, August 24, August 31, 2001.
7. Since the bond hearing, the Court has been closed several days due to Labor Day, Jewish Holidays, Court closings due to bomb warnings. Also, counsel has been preparing the Appeal of the Magistrate's ruling.
8. It has also been agreed between defense counsel that an Omnibus Motion would be filed on behalf of all co-defendants.
9. Counsel has discussed this matter with several of the attorneys for co-defendants and all are uniformly requesting additional time to file pre-trial motions.
10. At the time of this Motion, undersigned counsel has been unable to contact Brian McCormick, the prosecutor in the case *sub judice*.

WHEREFORE, the Defendant respectfully prays unto this Honorable Court allowing the Defendant, David Bell, to adopt and join the co-defendant Mamone's Motion for Extension to File Pre-Trial Motions and Order be entered granting his request for an extension of time.

Respectfully submitted,  
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I HEREBY CERTIFY that a true and correct copy of this foregoing has been furnished by U.S. Mail this 20 day of September, 2001, to the following listed attorneys.



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